

Exhibit 2

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TYLER ERDMAN,

Plaintiff,

against

ADAM VICTOR,

Defendant.

Index No. 20-cv-4162 (LGS)
(GWG)

**DEFENDANT'S
SUPPLEMENTAL
RESPONSE TO PLAINTIFFS
FIRST SET OF
INTERROGATORIES**

Defendant ADAM VICTOR, ("Defendant"), by and through the undersigned counsel, hereby furnishes this Response to Plaintiff TYLER ERDMAN'S ("Plaintiff") First Set of Interrogatories.

The Responses herein reflect the knowledge of the Defendant as of the date of the Responses, and Defendant's Responses involve an ongoing investigation into the Plaintiff's Requests. Defendant reserves the right to amend or supplement these Responses pursuant to Federal Rule 26(e)(1) as becomes necessary and appropriate.

**DEFENDANT'S SUPPLEMENTAL RESPONSES TO FIRST SET OF
INTERROGATORIES**

Interrogatory No. 1:

Fully identify all documents and persons with knowledge or documents relating to any claim in this action.

Response to Interrogatory No. 1:

Documents with knowledge relating to any claim are the court filings mentioned in Plaintiff's Second Amended Complaint containing allegedly defamatory statements, as well as the written statements mentioned in Plaintiff's Second Amended Complaint made to third parties, including governmental entities, containing allegedly defamatory statements, the H1-B Visa of Yevgeniya Khatskevich, and the Answer in this action to be filed December 1. Persons having knowledge include Yevgeniya Khatskevich and Nazym Toktassynova, whose present addresses and places of employment are unknown

to the Defendant.

Interrogatory No. 2:

Fully identify all documents or persons related to each denial of a material allegation and each affirmative defense in your pleadings.

Response to Interrogatory No. 2:

Documents with knowledge relating to any claim are the court filings mentioned in Plaintiff's Second Amended Complaint containing allegedly defamatory statements, as well as the written statements mentioned in Plaintiff's Second Amended Complaint made to third parties, including governmental entities, containing allegedly defamatory statements, the H1-B Visa of Yevgeniya Khatskevich, and the Answer in this action to be filed December 1. Persons having knowledge include Yevgeniya Khatskevich and Nazym Toktassynova, whose present addresses and places of employment are unknown to the Defendant.

Interrogatory No. 3:

Fully identify all documents in support of your response to these interrogatories.

Response to Interrogatory No. 3:

Documents with knowledge relating to any claim are the court filings mentioned in Plaintiff's Second Amended Complaint containing allegedly defamatory statements, as well as the written statements mentioned in Plaintiff's Second Amended Complaint made to third parties, including governmental entities, containing allegedly defamatory statements, the H1-B Visa of Yevgeniya Khatskevich, and the Answer in this action to be filed December 1. Persons having knowledge include Yevgeniya Khatskevich and Nazym Toktassynova, whose present addresses and places of employment are unknown to the Defendant.

Interrogatory No. 4:

Fully identify any documents or persons with knowledge regarding the allegations made in the Amended Complaint, and Affirmative Defenses asserted in the Answer to Counterclaims submitted in *Adam Victor, et al. v. Erdman v. Khatskevich*, Index No. 158981/2014 in the Supreme Court of the State of New York, New York County.

Response to Interrogatory No. 4:

Documents with knowledge relating to the Amended Complaint and Answer are the H1-B Visa and the Complaint of Yevgeniya Khatskevich in Index No. 151658/14. Persons having knowledge include Plaintiff, Yevgeniya Khatskevich, Setec, Sonia Bozic, Oksana

Chumanenko, Yigal Zohar, Francisco Filho, Nazym Toktasynnova, Steve Ingenito, Juan Perez, NYPD Detective Richard Bradish, and John Brennan, Esq..

The known addresses of the abovementioned entities are:

Yevgeniya Khatskevich (employment and address unknown)

Setec (8391 Beverly Blvd., #167, Los Angeles, CA 90048

Sonia Bozic (place of employment: College of Media and Communication in Belgrade, Serbia, Karadjordjeva 65, 11000 Belgrade, Serbia)

Oksana Chumanenko (Ukraine, employment and address unknown)

Yigal Zohar (Romania, employment and address unknown)

Francisco Filho (Brazil, employment and address unknown)

Nazym Toktasynnova (employment and address unknown)

Steve Ingenito (place of employment: LEMOS Management, 6 Howard Place, Melville, NY 11747)

Juan Perez (employment and address unknown)

Richard Bradish (NYPD, address unknown)

John Brennan (Plaintiff's attorney in other actions; address in the possession of the Plaintiff)

Interrogatory No. 5

Fully identify any documents or persons with knowledge regarding the allegations made in the Complaint filed in *Transnational Management Systems, LLC v. Tyler Erdman*, Case Id N15C-12-212 in the Superior Court of the State of Delaware in and for New Castle County ("Delaware Complaint").

Response to Interrogatory No. 5

Documents are the NY Post articles dated around December 8, 2015 concerning the matters related to this case. A person with knowledge regarding those allegations made is Ken Lazar, a financial person who was enlisted to secure financing for my aviation companies. His present employment and address are unknown. The Davidoff Hatcher law firm, my lawyers at the time, would be in possession of documents regarding the allegations. Their address is 605 Third Avenue, New York, NY 10158.

Interrogatory No. 6

Fully identify all documents or persons with knowledge related to the claim made related to extortion, theft or any crimes as described in the Delaware Complaint.

Response to Interrogatory No. 6

Documents are the NY Post articles dated around December 8, 2015 concerning the matters related to this case. A person with knowledge regarding those allegations made is Ken Lazar, a financial person who was enlisted to secure financing for my aviation companies. His present employment and address are unknown. The Davidoff Hutcher law firm, my lawyers at the time, would be in possession of documents regarding the allegations. Their address is 605 Third Avenue, New York, NY 10158.

Interrogatory No. 7

Fully identify all documents or persons with knowledge related to the claim made in paragraph 48-50 of the Delaware Complaint.

Response to Interrogatory No. 7

Documents are the NY Post articles dated around December 8, 2015 concerning the matters related to this case. A person with knowledge regarding those allegations made is Ken Lazar, a financial person who was enlisted to secure financing for my aviation companies. His present employment and address are unknown. The Davidoff Hutcher law firm, my lawyers at the time, would be in possession of documents regarding the allegations. Their address is 605 Third Avenue, New York, NY 10158.

Interrogatory No. 8

Fully identify all documents or persons with knowledge related to the claim made in paragraph 71 of the Delaware Complaint.

Response to Interrogatory No. 8

Documents are the NY Post articles dated around December 8, 2015 concerning the matters related to this case. A person with knowledge regarding those allegations made is Ken Lazar, a financial person who was enlisted to secure financing for my aviation companies. His present employment and address are unknown. The Davidoff Hutcher law firm, my lawyers at the time, would be in possession of documents regarding the allegations. Their address is 605 Third Avenue, New York, NY 10158.

Interrogatory No. 9

Fully identify all documents or persons with knowledge related to the computation of damages alleged in the Delaware Complaint.

Response to Interrogatory No. 9

Documents are the NY Post articles dated around December 8, 2015 concerning the matters related to this case. A person with knowledge regarding those allegations made is Ken Lazar, a financial person who was enlisted to secure financing for my aviation companies. His present employment and address are unknown. The Davidoff Hutcher law firm, my lawyers at the time, would be in possession of documents regarding the allegations. Their address is 605 Third Avenue, New York, NY 10158.

Interrogatory No. 10

Fully identify all documents or persons with knowledge related to the allegations made in the Complaint filed in Victor v. Khatskevich, Case Number 2019 CA 001264 B, in the Superior Court of the District of Columbia Civil Division.

Response to Interrogatory No. 10

Documents with knowledge were the list of stolen files provided by John Brennan, counsel for Plaintiff in other actions, as well as spreadsheets of hard drives copied by the Plaintiff. Other documents were the files and notes of Pat Timlin, Esq. (place of employment: Silverseal, 10 Fulton Street, #308, New York, NY 10038) from his talks with the NY District Attorney. Persons familiar with the allegations were Sonia Bozic, Steve Ingenito, Juan Perez, Viktor (address and place of employment unknown), Yigal Zohar, Gil Kinderland (address and place of employment unknown), and Louis Freeh, Esq. (former director of the FBI, address and place of employment unknown). Gil Kinderland had recommended a detective agency (name unknown) who had received the abovementioned documents as well.

Interrogatory No. 11

Fully identify all documents or persons with knowledge regarding employees, interns, persons or entities performing work for Victor, or any entities which he controls.

Response to Interrogatory No. 11

Persons in possession of documents are Plaintiff and Yevgeniya Khatskevich. Persons with knowledge include Sonia Bozic and Nazym Toktasynnova.

Interrogatory No. 12

Fully identify any documents or persons with knowledge related to forensic analysis of electronic devices, forensic analysis of physical evidence, investigations, background checks or any other investigations performed in relation to Plaintiff, Khatskevich, and/or Tokatassynnova.

Response to Interrogatory No. 12

Documents would be the analyses performed by the first forensic firm employed by Defendant, RVM Enterprises (624 S. Grand Avenue, Suite 2950, Los Angeles, CA 90017), and Setec. Persons in possession of documents are Defendant's former attorneys at Schlam Stone (26 Broadway, #19, New York, NY 10004), Richard Bradish, Pat Timlin, Esq., Gil Kinderland, and Louis Freeh.

Interrogatory No. 13

Fully identify all documents or persons with knowledge related to any agreements drafted or executed involving cooperation, testimony, payments or similar relating to any legal actions involving Plaintiff, Khatskevich, Toktassynova.

Response to Interrogatory No. 13

There were no such agreements.

Interrogatory No. 14

Fully identify any documents or persons with knowledge related to Sonja Bozic's claim of "As your witness, I get 10%".

Response to Interrogatory No. 14

No persons or documents exist to the best of Defendant's knowledge responsive to this interrogatory.

Interrogatory No. 15

Fully identify any documents or persons with knowledge related to your claim that Erdman and Khatskevich did not perform work for Manhattan Place Condominium.

Response to Interrogatory No. 15

Some documents (emails, employment records, deposition transcripts) are in the possession of the Plaintiff from other ongoing litigations between the Parties. Other documents would be business records maintained by MPC. These documents would be in the possession of Michael Rothschild (Building Manager, AJ Clarke Real Estate Corp., 250 West 57th Street, New York, NY 10107) and Greg DeJong (Superintendent, 630 First Avenue, New York, NY 10016).

Interrogatory No. 16

Fully identify any documents or persons with knowledge relating to Victor offering or agreeing to indemnify Manhattan Place Condominium in actions relating to Plaintiff and/or

Khatskevich.

Response to Interrogatory No. 16

Defendant never agreed to unilaterally indemnify MPC.

Interrogatory No. 17

Fully identify any documents or persons with knowledge relating to Victor or his agents' interactions with law enforcement or other government agencies as they relate to Plaintiff, Khatskevich or Toktasynnova.

Response to Interrogatory No. 17

Documents with knowledge were the list of stolen files provided by John Brennan, counsel for Plaintiff in other actions, as well as spreadsheets of hard drives copied by the Plaintiff. Other documents were the files and notes of Pat Timlin, Esq. (place of employment: Silverseal, 10 Fulton Street, #308, New York, NY 10038) from his talks with the NY District Attorney. Persons familiar with the allegations were Gil Kinderland (address and place of employment unknown), and Louis Freeh, Esq. (former director of the FBI, address and place of employment unknown). Gil Kinderland had recommended a detective agency (name unknown) who had received the abovementioned documents as well.

Interrogatory No. 18

Fully identify any documents or persons with knowledge related to a search of email accounts in or around November 2015 including but not limited to addresses used by Khatskevich, Toktasynnova, and Sonja Bozic.

Response to Interrogatory No. 18

Documents would be emails between various parties. Persons in possession of documents would be Schlam Stone.

Interrogatory No. 19

Fully identify any documents or persons with knowledge related to the deletion or loss of any evidence including but not limited to any email accounts, electronic information or hard copy records.

Response to Interrogatory No. 19

According to the NYPD, the only files deleted were those deleted by others. Defendant did not delete any files.

Interrogatory No. 20

Fully identify any documents or persons with knowledge related to any claims relating to criminal actions claimed to have been performed by Plaintiff, Khatskevich, or Toktasynnova.

Response to Interrogatory No. 20

Documents with knowledge related to claims involving criminal actions are Affidavits by Yevgeniya Khatskevich and the Plaintiff. Persons in possession of documents are NYPD Detective Richard Bradish, and Pat Timlin, Esq. Persons familiar with the allegations were Gil Kinderland (address and place of employment unknown), Louis Freeh, Esq., and Brian Kennedy, Esq. (87 Walker Street, New York, NY 10013).

Interrogatory No. 21

Fully identify any documents or persons with knowledge related to payments made to or for the benefit of Plaintiff including (sic) any of his entities, Khatskevich or Toktassynnova including any checks given to them, credit card transactions paid for, rent payments, school payments or other considerations.

Response to Interrogatory No. 21

Plaintiff's interrogatory is not stated with sufficient precision as to enable an exact answer. A person who would be in possession of such documents is Brian Kennedy.

Interrogatory No. 22

Fully identify any documents and the recipients of any communications regarding Plaintiff, Khatskevich, or Toktasynnova that mentions extortion, "hacking", theft or other criminal acts.

Response to Interrogatory No. 22

Persons in possession of the subject emails are Schlam Stone and Davidoff Hutcher, RVM, Setec, Richard Bradish, NYPD, Pat Timlin, Gil Kinderland, Louis Freeh, and the detective agency recommended by Gil Kinderland. The list of stolen files provided by John Brennan as well as the spreadsheets of hard drives copied by Plaintiff as derived by Setec.

Interrogatory No. 23

Fully identify any documents or persons with knowledge regarding any efforts to retaliate against Plaintiff, Khatskevich and/or Toktasynnova.

Response to Interrogatory No. 23

Defendant states there were no efforts to retaliate against anyone.

Interrogatory No. 24

Fully identify any physical evidence and its custodian related to any claims of criminal acts or the furtherance of extortion including any hard drives, or electronic devices claimed to have been improperly accessed by Plaintiff or Khatskevich.

Response to Interrogatory No. 24

Persons in possession of documents and/or drives are the NYPD and Setec. Documents with knowledge were the list of stolen files provided by John Brennan, counsel for Plaintiff in other actions, as well as spreadsheets of hard drives copied by the Plaintiff. Other documents were the files and notes of Pat Timlin, Esq. (place of employment: Silverseal, 10 Fulton Street, #308, New York, NY 10038) from his talks with the NY District Attorney. Persons familiar with the allegations were Gil Kinderland (address and place of employment unknown), and Louis Freeh, Esq. (former director of the FBI, address and place of employment unknown). Gil Kinderland had recommended a detective agency (name unknown) who had received the abovementioned documents as well. Other than documents and the hard drives analyzed by RVM and Setec there exists no physical evidence.

Interrogatory No. 25

Fully identify all persons involved in the preparation of answers to these Interrogatories.

Response to Interrogatory No. 25

Persons involved were the Defendant and his attorneys.

Dated: Brooklyn, New York
February 11, 2022

/s/ Adam Victor

TO: Tyler Erdman
Salt Lake City, UT

VERIFICATION

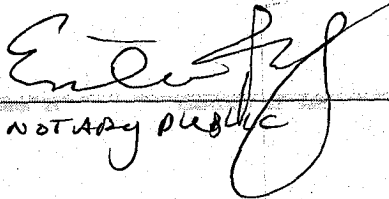
ADAM VICTOR, hereby affirms and verifies that he is a Defendant in this action; that he has reviewed the foregoing Supplemental Responses to Plaintiff's First Set of Interrogatories and he believes that, based upon matters within his personal knowledge and

on information and documents that have been provided herein, the response to the interrogatories herein are true and correct to the best of his knowledge.



ADAM VICTOR

Sworn to before me this
14th day of February, 2022.



NOTARY PUBLIC

EMILIO RODRIGUEZ
Notary Public, State of New York
Registration No. 02RO6321688
Qualified in Queens County
Commission Expires July 30, 2023